

**FISONS**

Pharmaceuticals  
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JAN 19 1994

FCC MAIL ROOM

January 13, 1994

Mr. William F. Canton  
Acting Secretary  
Federal Communications Commission  
1919 M Street NW  
Washington, D.C. 20554

Re: CC Docket 93-292

Dear Mr. Canton:

It was with great interest I read the recent FCC Notice of Proposed Rulemaking concerning Toll Fraud. As a telecommunications professional who is responsible for my company's communications systems, I am encouraged by the proposed rulemaking because even though I have taken each and every protective step recommended by the IXC's and CPE vendors to secure my systems, I can still experience toll fraud. It is impossible to secure my system 100% from fraud.

PBX owners should not be responsible for 100% of the toll fraud if we don't control 100% of our destiny. Since our destiny is not only controlled by our PBX security precautions, but also by the information, services and equipment provided IXCs, LECs and CPEs, the law should reflect that. It is preposterous to think that the IXCs, LECs and CPEs who all have a very important part in this issue, have absolutely no legal obligations to warn customers and therefore, no real incentive to stop fraud.

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While the programs offered by IXC's, such as MCI Detect, AT&T NetProtect, and Spring Guard have broken new ground in relation to preventing toll fraud, they still don't do enough. Some of these services are too expensive for smaller companies and the educational information is superficial. Monitoring by the IXC's should be a part of the basic interexchange service offerings, as all companies, large and small, are vulnerable to toll fraud. If the IXC's were monitoring all traffic, there wouldn't be any cases of toll fraud for periods longer than a day.

As hackers begin new methods of breaking in to systems by using local lines instead of 800 numbers, the LECs should be required to offer monitoring services similar to the IXC's.

I applaud the provisions outlined in the NPRM on shared liability. They are fair and equitable. Shared liability will require clear definitions of the specific responsibilities of the CPE owner to secure their equipment, the manufacturer to adequately warn the customer of the toll fraud risks associated with features of the CPE, and the IXC's and LECs to offer detection and prevention programs and educational services. If toll fraud occurs and one of the parties should fail to meet these responsibilities and prove to be negligent, then they should bear the cost of the fraud. I do not believe any damages should be awarded to the aggrieved parties. Should all parties have met the aforementioned responsibilities, and toll fraud occurs, then liability should be shared equally.

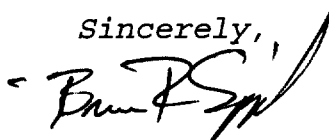
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Until we come up with an adequate method for law enforcement to catch and prosecute these criminals, toll fraud will continue to grow beyond the \$5 billion problem it is today. We must develop legislation that clearly defines and penalizes this criminal activity and gives law enforcement the tools it needs to track and prosecute the perpetrators of toll fraud.

Toll fraud is an illegal, fraudulent theft of service. I am encouraged that if we all work together we can make a positive impact on this terrible problem.

Sincerely,

A handwritten signature in dark ink, appearing to read "Bruce R. Sippel", with a large, sweeping flourish extending upwards and to the right.

Bruce R. Sippel  
Building Services Manager

/gr



VERMONT NATIONAL BANK

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JAN 19 1994

FCC MAIL ROOM

January 12, 1994

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Sincerely,

  
Gail B. Cobb

Assistant Vice President  
Telecommunications



**MOUNT CARMEL  
CORPORATE SERVICES**

*"The Spirit of Life"*

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52 Robinwood Avenue • Columbus, Ohio 43213-1708 • (614) 238-6510

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**JAN 19 1994**

**FCC MAIL ROOM**

January 11, 1993

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Federal Communications Commission  
1919 M Street NW  
Washington, D.C. 20554

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*Quigley*

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Sincerely,

Charles M. Pledgon



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W. L. GORE & ASSOCIATES, INC.

1901 BARKSDALE ROAD • P.O. BOX 9236 • NEWARK, DELAWARE 19714-9236  
PHONE: 302/368-3700 • FAX: 302/738-5993  
ELECTRONIC PRODUCTS DIVISION

January 10, 1994

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JAN 19 1994

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Federal Communications Commission  
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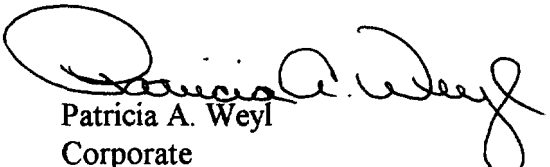
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Sincerely,

  
Patricia A. Weyl  
Corporate  
Telecommunication  
Manager

PAW/saw

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January 11, 1994

Mr. William F. Canton  
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Re: CC Docket no. 93-292

Dear Mr. Canton:

I am a telecommunications professional who is responsible for my company's telecommunication systems security and I am painfully aware that although I may reduce the risk, no matter how many steps I take to secure my systems, I am still vulnerable to toll fraud. That is why I am so encouraged by the proposed rule making.

PBX owners should not be responsible for 100% of toll fraud if we are not controlling 100% of our destiny. This destiny is ultimately controlled by not only our implementation and proper use of PBX security features but by the information, equipment and services provided by IXC's, LEC's and CPE vendors. The legal obligations of the IXC's, LEC's and CPE vendors should provide the proper incentive to reduce and eliminate all toll fraud.

Current programs offered by some IXC's (Sprint Guard™, MCI Detect™, and AT&T Netprotect™) and insurance companies are too expensive. Monitoring and proper notification by the IXC's must be a part of the basic interexchange service offerings. This should eliminate cases of toll fraud greater than 24 hours.

LEC's must also provide monitoring and proper notification as a part of their basic service offerings. Local lines are as vulnerable to toll fraud. As the line between IXC and LEC becomes fuzzier, monitoring and proper notification by all carriers will be even more applicable.

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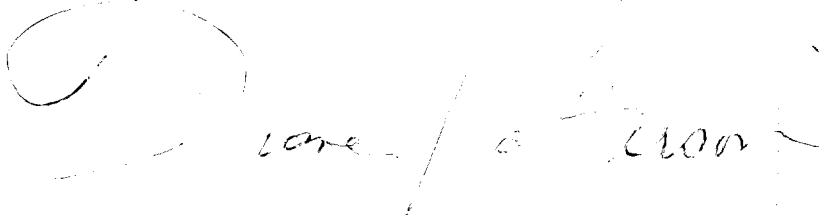
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If toll fraud occurs due to the negligence of one or more parties then the financial loss should be equitably distributed among those negligent parties. If there is no proven negligence the financial loss should be equitably distributed among CPE owner, and all CPE vendor(s), LEC(s) and IXC(s) involved.

Toll Fraud is a financially devastating problem that affects the entire telecommunications industry including users, vendors and carriers. I am sure that if we all work together we can and will make a positive impact on this problem.

Sincerely,

A handwritten signature in cursive script, appearing to read "Doreen A. Brown", is written over a faint, large circular stamp or watermark.



Memorial Medical Center, Inc.

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Sincerely,



Donna Saucier  
Manager, Telecommunication



**COURTAULDS  
AEROSPACE**

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January 10, 1993

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**JAN 19 1994**

**FCC MAIL ROOM**

5430 San Fernando Road  
P.O. Box 1800  
Glendale, CA 91209  
(818) 240-2060

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1919 M Street NW  
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**COURTAULDS  
AEROSPACE**

5430 San Fernando Road  
P.O. Box 1800  
Glendale, CA 91209  
(818) 240-2060

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**Sincerely,**

*Kipung & Stanfill*

WORLD FINANCIAL NETWORK NATIONAL BANK

4590 EAST BROAD STREET

COLUMBUS, OHIO 43213

TEL 614 755 5000

January 13, 1994

ROCKETT FIVE COPY ORIGINAL

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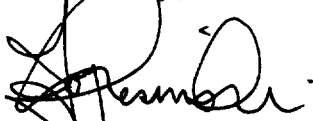
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A handwritten signature in black ink, appearing to read "Joy Lesinski", written over a horizontal line.

Joy Lesinski  
Manager, Telecommunications

January 11, 1994

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PBX owners should not be responsible for 100% of toll fraud if we are not controlling 100% of our destiny. This destiny is ultimately controlled by not only our implementation and proper use of PBX security features but by the information, equipment and services provided by IXC's, LEC's and CPE vendors. The legal obligations of the IXC's, LEC's and CPE vendors should provide the proper incentive to reduce and eliminate all toll fraud.

Current programs offered by some IXC's (Sprint Guard™, MCI Detect™, and AT&T Netprotect™) and insurance companies are too expensive. Monitoring and proper notification by the IXC's must be a part of the basic interexchange service offerings. This should eliminate cases of toll fraud greater than 24 hours.

LEC's must also provide monitoring and proper notification as a part of their basic service offerings. Local lines are as vulnerable to toll fraud. As the line between IXC and LEC becomes fuzzier, monitoring and proper notification by all carriers will be even more applicable.

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CPE vendors need to provide telecommunications security as a cost of doing business instead of an opportunity to sell additional products and services. CPE vendors should be required to provide warnings about the risks of toll fraud, as it specifically relates to their equipment and provide solutions to reduce the risk of toll fraud. All CPE should be delivered without standard default passwords, which are well known to the criminal community. All login IDs, including those used by the vendor, should be disclosed at the time of purchase and at installation. All customer passwords should be changed or created at installation and the customer should receive written assurance that all vendor passwords will meet minimum requirements regarding length, change schedule, and alpha numeric format. CPE vendors should be encouraged to offer security related hardware and software in the price of their systems.

The provisions outlined in the NPRM are fair and equitable. Shared liability will require clearly defining the responsibilities of the;

- CPE owner to secure their equipment
- CPE vendors to warn customers of the specific toll fraud risks associated with their equipment
- IXC's and LEC's to offer detection, notification, prevention, and education offerings and services

If toll fraud occurs due to the negligence of one or more parties then the financial loss should be equitably distributed among those negligent parties. If there is no proven negligence the financial loss should be equitably distributed among CPE owner, and all CPE vendor(s), LEC(s) and IXC(s) involved.

Toll Fraud is a financially devastating problem that affects the entire telecommunications industry including users, vendors and carriers. I am sure, that if we all work together we can and will make a positive impact on this problem.

Sincerely,

Nancy Graven  
Telecommunications Manager  
ARA Services, INC.  
1101 Market Street  
Philadelphia, PA 19106



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JAN 19 1994

52 Robinwood Avenue • Columbus, Ohio 43213-1708 • (614) 238-6510

FCC MAIL ROOM

January 12, 1993

Mr. William F. Canton  
Acting Secretary  
Federal Communications Commission  
1919 M Street NW  
Washington, D.C. 20554

RE: CC Docket no. 93-292

Dear Mr. Canton:

I am a telecommunications professional who is responsible for my company's telecommunication system and I am painfully aware that although I may reduce the risk, no matter how many steps I take to secure my systems, I am still vulnerable to toll fraud. That is why I am so encouraged by the proposed rule making.

PBX owners should not be responsible for 100% of toll fraud if we are not controlling 100% of our destiny. This destiny is ultimately controlled by not only our implementation and proper use of PBX security features but by the information, equipment and services provided by IXC's, LEC's and CPE vendors. The legal obligations of the IXC's, LEC's and CPE vendors should provide the proper incentive to reduce and eliminate all toll fraud.

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- IXC's and LEC's to offer detection, notification, prevention, and education offerings and services

If toll fraud occurs due to the negligence of one or more parties then the financial loss should be equitably distributed among those negligent parties. If there is no proven negligence the financial loss should be equitably distributed among CPE owner, and all CPE vendor(s), LEC(s), and IXC(s) involved.

Toll Fraud is a financially devastating problem that effects the entire telecommunications industry including users, vendors, and carriers. I am sure that if we all work together we can and will make a positive impact on this problem.

Sincerely,

A handwritten signature in black ink, appearing to read "Dave Plevniak". The signature is fluid and cursive, with a large initial "D" and a stylized "P".

Dave Plevniak  
Director, Network Systems

Crestar Bank  
P.O. Box 26150  
Richmond, Virginia 23260-6150  
(804) 782-5000

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**CRESTAR**

January 12, 1994

Mr. William F. Canton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, NW  
Washington, DC 20554

RE: CC Docket No. 93-292

Dear Mr. Canton:

I am a telecommunications professional who is responsible for my company's telecommunication systems and I am painfully aware that although I may reduce the risk, no matter how many steps I take to secure my systems, I am still vulnerable to toll fraud. That is why I am so encouraged by the proposed rule making.

The legal obligations of the IXC's, LEC's, and CPE vendors should provide the proper incentive to reduce and eliminate all toll fraud.

Current programs offered by some IXC's (Sprint Guard™, MCI Detect™, and AT&T Netprotect™) and insurance companies are too expensive. Monitoring and proper notification by the IXC's must be a part of the basic interexchange service offerings. This could eliminate cases of toll fraud greater than 24 hours.

LEC's must also provide monitoring and proper notification as a part of their basic service offerings. Local lines are as vulnerable to toll fraud. As the line between IXC and LEC becomes fuzzier, monitoring and proper notification by all carriers will be even more applicable.

CPE vendors need to provide telecommunications security as a cost of doing business instead of an opportunity to sell additional products and services. CPE vendors should be required to provide warnings about the risks of toll fraud, as it specifically relates to their equipment and provide solutions to reduce the risk of toll fraud.

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William F. Canton  
Page 2  
January 12, 1994

The provisions outlined in the NPRM are fair and equitable. Shared liability will require clearly defining the responsibilities of the:

- CPE owner to secure their equipment
- CPE vendors to warn customers of the specific toll fraud risks associated with their equipment
- IXC's and LEC's to offer detection, notification, prevention, and education offerings and services

If toll fraud occurs due to the negligence of one or more parties then the financial loss should be equitably distributed among those negligent parties. If there is no proven negligence, the financial loss should be equitably distributed among CPE owner and all CPE vendor(s), LEC(s), and IXC(s) involved.

Toll fraud is a financially devastating problem that effects the entire telecommunications industry, including users, vendors, and carriers. I am sure that if we all work together we can and will make a positive impact on this problem.

Sincerely,



W. W. Stephenson, Jr.  
Vice President



# County of El Dorado

## Communications and Emergency Services

330 Fair Lane - Placerville, California 95667 • (916) 621-5555 FAX (916) 621-2187

January 10, 1994

Mr. William F. Canton  
Acting Secretary  
Federal Communications Commission  
1919 M Street NW  
Washington, DC 20554

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JAN 11 9 1994  
FCC MAIL ROOM

Dear Mr. Canton:

Re: CC Docket No. 93-292

I am a telecommunications professional who is responsible for my agency's telecommunication system's security and I am painfully aware that although I may reduce the risk, no matter how many steps I take to secure my systems, I am still vulnerable to toll fraud. That is why I am so encouraged by the proposed rule making.

PBX owners should not be responsible for 100% of toll fraud if we are not controlling 100% of our destiny. This destiny is ultimately controlled by not only our implementation and proper use of PBX security features, but by the information, equipment, and services provided by IXC's, LEC's and CPE vendors. The legal obligations of the IXC's, LEC's and CPE vendors should provide the proper incentive to reduce and eliminate all toll fraud.

Current programs offered by some IXC's (Spring Guard™, MCI Detect™, and AT&T Netprotect™) and insurance companies are too expensive. Monitoring and proper notification by the IXC's must be a part of the basic interexchange service offerings. This should eliminate cases of toll fraud greater than 24 hours.

LEC's must also provide monitoring and proper notification as a part of their basic service offerings. Local lines are just as vulnerable to toll fraud. As the line between IXC and LEC becomes fuzzier, monitoring and proper notification by all carriers will be even more applicable.

CPE vendors need to provide telecommunications security as a cost of doing business instead of an opportunity to sell additional products and services. CPE vendors should be required to provide warnings about the risks of toll fraud, as it specifically relates to their equipment, and provide solutions to reduce the risk of toll fraud. All CPE's should be delivered without standard default passwords, which are well known to the criminal community. All login IDs, including those used by the vendor, should be disclosed at the time of purchase and at

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Mr. William F. Canton  
January 10, 1994  
Page 2

installation. All customer passwords should be changed or created at installation and the customer should receive written assurance that all vendor passwords will meet minimum requirements regarding length, change schedule, and alpha numeric format. CPE vendors should be encouraged to offer security-related hardware and software in the price of their systems.


The provisions outlined in the NPRM are fair and equitable. Shared liability will require clearly defining the responsibilities of the:

- CPE owner to secure their equipment
- CPE vendors to warn customers of the specific toll fraud risks associated with their equipment
- IXC's and LEC's to offer detection, notification, prevention, and education services at no extra cost to subscribers

If toll fraud occurs due to the negligence of one or more parties, then the financial loss should be prorated among those negligent parties. If there is no proven negligence, the financial loss should be equitably distributed among CPE owner and all CPE vendor(s), LEC(s), and IXC(s) involved.

Toll Fraud is a financially devastating problem that affects the entire telecommunications industry including users, vendors, and carriers. I am sure that if we all work together, we can and will come up with some positive solutions to this national problem.

Sincerely,

  
Oliver C. Reighn, Jr.  
Communications and Emergency Services Director  
El Dorado County

OR:jh

\\telecom\vol\fraud.fcc